

MEMO ENDORSED



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May 27, 2014

Plaintiff is directed to submit
a written response by May 30, 2014,
by the close of business.

SO ORDERED:

 5/27/14

HON. EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE

BY FACSIMILE: (212) 805-7943

Honorable Edgardo Ramos
United States District Judge
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Darnell Nicholls v. City of New York, 14 Civ. 2683 (ER)

Your Honor:

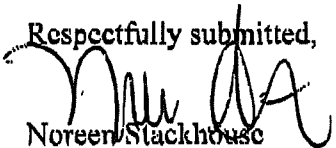
I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department handling the defense of the above-referenced matter on behalf of defendant City of New York ("City") in the above-referenced matter. Pursuant to the Plan for Certain § 1983 Cases against the City of New York ("§ 1983 Plan"), I respectfully request that the Court direct plaintiff to provide the City with the executed § 160.50 Release required by the § 1983 Plan. Further, I respectfully request that the Court extend the City's time to answer the complaint to sixty (60) days from the date the § 160.50 Release is served on the City. The § 160.50 Release is necessary so that the police, Criminal Court and District Attorney records pertaining to plaintiff's claims can be unsealed and the action can proceed in a timely fashion pursuant to the § 1983 Plan. The City has made no prior request for this relief.

Accordingly, pursuant to Paragraph No. 9 of the Plan, which allows a party to contact the presiding judge in the event that the other party fails to comply with any part of the Plan, the City respectfully requests that the Court: (1) direct the plaintiff to provide the § 160.50 Release to this office by a date certain, and (2) extend the City's time to answer or otherwise respond to the complaint to 60 days from the date the § 160.50 Release is served on the City.

MEMO ENDORSED

In view of the foregoing, it is respectfully requested that the Court grant the within request. Thank you for your consideration.

Respectfully submitted,


Noreen Stackhouse
Assistant Corporation Counsel
Special Federal Litigation Division

cc: George T. Peters, Esq. (By facsimile)
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